

# Exhibit C

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

STACIE RAY,  
*et al.*,

Plaintiffs,

V.

STEPHANIE McCLOUD, DIRECTOR,  
OHIO DEPARTMENT OF HEALTH, *et  
al.*

Case No. 2:18-cv-00272

Judge Michael Watson

Magistrate Judge Chelsey Vascura

**DECLARATION OF SUSAN J. BECKER**  
(Pursuant to 28 U.S.C. §1746)

I, Susan J. Becker, hereby declare under penalty of perjury that the following are true and correct to the best of my knowledge and belief:

1. I am above the age of 18 and reside in Ohio.
2. I have personal knowledge of the matters to which I attest.
3. I have been licensed to practice law by the Supreme Court of Ohio since 1984, and am also licensed by the United States District Court for the Southern District of Ohio, the United States District Court for the Northern District of Ohio, the U.S. Court of Appeals for the Sixth Circuit, and the U.S. Supreme Court.
4. Following graduation from law school in 1983, I completed a two-year judicial clerkship with the Honorable Robert B. Krupansky of the U.S. Court of Appeals for the Sixth Circuit in 1985. I then worked for five years as a litigation associate at a major international law firm. In 1990 I accepted an offer from Cleveland State University to join the fulltime faculty of Cleveland-Marshall of Law.

5. From 1990-2014, I taught practice-oriented courses including Civil Procedure, Remedies, Pretrial Practice, Legal Ethics and Professionalism, and Sexual Orientation, Gender, and Law. My scholarship focused primarily on legal strategies for obtaining recognition of constitutional and civil rights for LBGT persons. I maintained a modest pro bono practice throughout my academic career, providing legal services to LGBT individuals who experienced discrimination in a variety of settings. I retired from Cleveland State University in 2014, but continue to mentor law students and new lawyers in my role as Cleveland-Marshall's Public Interest Leader in Law.
6. Since 2015 I have served as General Counsel of the Ohio ACLU. This duties of this Board position include helping to shape and implement litigation strategies in various cases and serving as co-counsel in select cases.
7. My resume attached as Exhibit C-1 to this Declaration provides additional details of my professional qualifications to serve as co-counsel in this case.
8. I kept contemporaneous time records as indicated documented in Plaintiffs' application for attorney's fees for this case. I exercised billing judgment in finalizing my records, for example excluding time for relatively minor but collectively time-consuming tasks such as responding to emails and participating in short meetings and phone calls with co-counsel and/or clients.
9. A true and correct copy of the time records for which I am seeking a fee award is attached to this declaration as Exhibit C-2.
10. My hourly rate for this type of litigation based on my experience and comparable rates in the relevant legal community is \$500 per hour.

11. The lodestar for my work on this case, multiplying my reasonable rate by my hours expended, is  $57.5 \times 500 = \$28,750$ .

I declare under penalty of perjury that the foregoing is true and correct. Executed on Feb. 1, 2021

/s/ Susan J. Becker  
Susan J. Becker